UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Case No. 1:22-cv-00125

Plaintiffs,

v.

Hon. Matthew F. Kennelly

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

PLAINTIFFS' MOTION TO SEAL THEIR MOTION TO DESIGNATE GEORGETOWN'S PRESIDENT AND HIS ASSISTANT AS CUSTODIANS AND TO COMPEL GEORGETOWN TO PRODUCE DOCUMENTS

Pursuant to the Confidentiality Order in this case (ECF No. 254) and Local Rule 26.2, Plaintiffs respectfully request that the Court grant this Motion to File Under Seal their Memorandum of Law in Support of their Motion to Designate Georgetown's President and his

Assistant as Custodians and to Compel Georgetown to Produce Documents. In support of their Motion, Plaintiffs state as follows:

- 1. The memorandum at issue discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order.
- 2. In accordance with Local Rule 26.2(c), the memorandum at issue will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court. In addition, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' motion.

Dated: November 15, 2023

/s/ Robert D. Gilbert

Robert D. Gilbert Elpidio Villarreal Robert S. Raymar David Copeland Steven Magnusson Natasha Zaslove

GILBERT LITIGATORS & COUNSELORS, P.C.

11 Broadway, Suite 615
New York, NY 10004
Phone: (646) 448-5269
rgilbert@gilbertlitigators.com
pdvillarreal@gilbertlitigators.com
rraymar@gilbertlitigators.com
dcopeland@gilbertlitigators.com
smagnusson@gilbertlitigators.com
nzaslove@gilbertlitigators.com

Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman Edward J. Normand Peter Bach-y-Rita Richard Cipolla

FREEDMAN NORMAND FRIEDLAND LLP

99 Park Avenue Suite 1910 New York, NY 10016 Tel: 646-350-0527 vel@fnf.law tnormand@fnf.law pbachyrita@fnf.law rcipolla@fnf.law

Ivy Ngo

FREEDMAN NORMAND FRIEDLAND LLP

1 SE 3d Avenue Suite 1240

Miami, FL 33131 Tel: 786-924-2900

ingo@fnf.law

/s/ Eric L. Cramer

Eric L. Cramer Caitlin G. Coslett Ellen Noteware

BERGER MONTAGUE PC

1818 Market Street, Suite 3600 Philadelphia, PA 19103 Tel: 215-875-3000 ecramer@bm.net ccoslett@bm.net enoteware@bm.net

Richard Schwartz

BERGER MONTAGUE PC

1720 W Division Chicago, IL 60622 Tel: 773-257-0255 rschwartz@bm.net Daniel J. Walker Robert E. Litan Hope Brinn **BERGER MONTAGUE PC** 2001 Pennsylvania Avenue, NW Suite 300

Washington, DC 20006 Tel: 202-559-9745 rlitan@bm.net dwalker@bm.net hbrinn@bm.net

Counsel for Plaintiffs